

FILED

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

APR 15 2024

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY le  
DEPUTY CLERK

San Antonio Division

SA24CA0387OG

Arturo S. Lopez Sr.

Case No.

(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Frank Kendall, III  
Secretary of the Air ForceJury Trial: (check one) ☒ Yes ☐ No

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Arturo S. Lopez Sr.
Street Address	125 Cielo Grande
City and County	Del Rio, Val Verde
State and Zip Code	Texas 78840
Telephone Number	830 461 2393
E-mail Address	amod7740@yahoo.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## Defendant No. 1

Name Frank Kendall, III

Job or Title *(if known)* Secretary of the Air Force

Street Address 1670 Air Force Pentagon

City and County Washington, DC 20330-1670

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address *(if known)* \_\_\_\_\_

## Defendant No. 2

Name Daniel Peterson

Job or Title *(if known)* Security Forces flight chief

Street Address 561 Liberty Dr.

City and County Del Rio , LAFB , Val Verde County

State and Zip Code Texas 78843

Telephone Number \_\_\_\_\_

E-mail Address *(if known)* \_\_\_\_\_

## Defendant No. 3

Name Anthony Scharf

Job or Title *(if known)* Division Section Cchief

Street Address 561 Liberty Dr.

City and County Del Rio, LAFB, Val Verde County

State and Zip Code Texas 78843

Telephone Number \_\_\_\_\_

E-mail Address *(if known)* \_\_\_\_\_

## Defendant No. 4

Name Isiah Thomas and No.5 Mrs. Megan Corlew

Job or Title *(if known)* Security Forces police/ LAFB Finance Comptroller

Street Address 561 Liberty Dr. / 246 Liberty Dr.

City and County Del Rio, LAFB, Val Verde County

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address *(if known)* \_\_\_\_\_

#5 Charles R. Vaich AF/ SAC LLESC  
 1 Washington Cir. Ste 10  
 Randolph AFB TX 78150-4564

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title VII of the Civil Rights Act of 1964, 42 U.S.C 2000 e 3a  
Unlawful Employment Practices ,Reprisal.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the  
State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:  
300,000 due to the violations of the aforementioned Act. Plaintiff has suffered a loss of past and future income.

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

My statement of claim is discrimination under Title VII of the civil rights act of 1964 2000 e 3a Unlawful Employment Practices. I Arturo S Lopez Sr., was unlawfully discriminated against on December 02, 2022, on the basis of Reprisal for participating in prior EEO Complaints: 5EOJ17001, 5EOJ1800535. 5EOJ 2000921 is a Currently ongoing case. Testifying ,Participating on MSPB Case that is currently ongoing, Participating in prior Commanders Directed Investigation and IG Investigations. I was discriminated against when I was unlawfully detained and held back by the Laughlin AFB Agency's security forces to prevent me from contacting the EEO Counselor and the Agency's Finance office Comptroller. I was detained and held back and deprived of my liberties, rights and privileges. I was issued an outdated Falsified debarment letter by the Agency's Security forces

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff seeks relief and to be made whole. Plaintiff seeks damages in the form of front pay and back pay, to include all loss of benefits which would have accrued in the event of continued employment. Plaintiff has suffered a loss of income in the past and in the future. Plaintiff has suffered humiliation, Mental anguish, and a loss of the enjoyment of life, Plaintiff has suffered constitutional Torts against him. Plaintiff seeks relief in the amount of 300,000



**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04/15/2024

Signature of Plaintiff



Printed Name of Plaintiff

Arturo S. Lopez Sr. / Pro-Se

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

United States District Court  
For the Western District of Texas  
San Antonio Division

Date: 04/15/2024

Statement of Claim:

My statement of claim is based on discrimination under Title VII of the Civil Rights Act of 1964 2000 e 3a. "Unlawful Employment Practices" The type of discrimination is Reprisal for participating in prior EEO protected activity in which I reported bad Aircraft Maintenance and Aircraft Maintenance that was never done yet signed off as if it the required Maintenance was done. As a result, I was retaliated against, and this Reprisal has been an ongoing discriminatory act to the current date. The Reprisal continues because of testifying, and participating in Commanders Directed investigation an MSPB case which is still ongoing to current date and for participating in IG Investigations. A strong nexus has been established throughout all these proceedings in which direct evidence will be entered. I was deprived of my rights, liberties, and privileges by Mr. Daniel Peterson, Mr. Anthony Scharf, Mr. Isiah Thomas on December 22, 2022, when I was deprived from seeing the EEO Counselor and from seeing the Finance Comptroller Mrs. Megan Corlew. I was intentionally and maliciously issued a false debarment Letter by Mr. Isiah Thomas to prevent me from entering the base and retrieving any information that would expose the Agency's deceptive practices and clear my name. I was deprived of seeing Ms. Megan Corlew at the Finance Comptroller's office on this same date. I explained that I needed to go see Ms. Corlew as she would not return my phone calls. Mrs. Corlew is the Employee's Timekeeper for the Maintenance section. The Agency's Comptroller's Finance office placed a wage garnishment against my Federal Disability Benefit Wages for a False Timecard Error that was created by this same Finance office and also entered a False Debt owed to them on my credit report. I was deprived of entering the base to clear this error. My Federal Disability benefits were unlawfully being

garnished for no reason. I have suffered severe adverse actions because of these discriminatory reprisal actions by these individuals. These individuals have violated my Rights, Liberties, Privileges and have violated 42 U.S.C 1983 and have committed Constitutional torts against me. Causing me to suffer severe Emotional Stress. I respectfully request to be made whole and seek relief in the amount of 300,000.00.

Very Respectfully, Arturo S. Lopez Sr.

A handwritten signature in blue ink, appearing to read 'A. Lopez'.